

IN IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
Plaintiff	§	
	§	
JANE DRAYCOTT AND	§	
PAULA KEYES	§	
Plaintiffs-Intervenors	§	CIVIL ACTION NO. 4:18-CV-644
	§	
v.	§	
	§	
CITY OF HOUSTON, TEXAS,	§	
Defendant.	§	

PLAINTIFFS-INTERVENORS' INITIAL DISCLOSURES

NOW COMES, Plaintiffs-Intervenors, Jane Draycott and Paula Keyes ("Plaintiffs") pursuant to Federal Rule of Civil Procedure 26(a)(1), hereby discloses to Defendant City of Houston, Texas ("COH") the following:

- i. **The name and, if known the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information –that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**

Captain Green
Address: Unknown
Telephone: Unknown

Green has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Phil Boriskie
Address: Unknown
Telephone: Unknown

Boriskie has knowledge regarding Jane Draycott's discrimination claims, harassment

claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Brian Williamson
Address: Unknown
Telephone: Unknown

Williamson has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Rick Flanagan
Address: Unknown
Telephone: Unknown

Flanagan has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Isidro Tamez
Address: Unknown
Telephone: Unknown

Tamez has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Terry Garrison
Address: Unknown
Telephone: Unknown

Garrison has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Captain Ponce
Address: Unknown
Telephone: Unknown

Ponce has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Robert Castleberry
Address: Unknown
Telephone: Unknown

Castleberry has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Robert Vara
Address: Unknown
Telephone: Unknown

Vara has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Greg Headberg
Address: Unknown
Telephone: Unknown

Headberg has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Chief Julian
Address: Unknown
Telephone: Unknown

Julian has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Erih Henshel
Address: Unknown
Telephone: Unknown

Henshel has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Elmer Williams
Address: Unknown
Telephone: Unknown

Henshel has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Berlyn Caylor-Strong
Address: Unknown
Telephone: Unknown

Caylor-Strong has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Eddie Ramirez
Address: Unknown
Telephone: Unknown

Ramirez has knowledge regarding Jane Draycott's discrimination claims, harassment claims, and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Captain Gonzales
Address: Unknown
Telephone: Unknown
Gonzales has knowledge regarding Paula Keyes' discrimination claims, harassment

claims and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Nefatera Alexander
Address: Unknown
Telephone: Unknown

Alexander has knowledge regarding Paula Keyes' discrimination claims, harassment claims and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant

Robin Allen
Address: Unknown
Telephone: Unknown

Allen has knowledge regarding Paula Keyes' discrimination claims, harassment claims and the hostile work environment, humiliation, and retaliation she was subjected to for complaining of discrimination and harassment during her employment with Defendant.

Discovery is ongoing, and Plaintiff will supplement the list as discovery progresses in accordance with the Federal Rules of Civil Procedure.

RESPONSE:

ii. **A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

RESPONSE: Will supplement at a later date.

iii. **A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

RESPONSE: Will supplement at a later date.

- iv. **For Inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action to indemnify or reimburse for payments made to satisfy the judgment.**

RESPONSE: None.

Respectfully submitted,

/s/ Joseph Y. Ahmad

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ATTORNEYS FOR PLAINTIFFS AND
INTERVENORS, JANE DRAYCOTT AND
PAULA KEYES

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd of June, 2018, a true and correct copy of the foregoing document was served on all counsel of record as follows:

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/s/ Joseph Y. Ahmad